

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

	:	No. 21-12210-amc
IN RE:	:	
JOHN MACINTOSH.	:	Chapter 13
Debtor	:	

EXHIBIT

Exhibits to Attach to Movant Hatboro Federal Saving's Motion for Relief from Automatic Stay (Document 24)

EXHIBIT Post-Petition Attorneys Fees per Court Order dated February 8, 2022.

TIMONEY KNOX, LLP

**P.O. Box 7544
400 Maryland Drive
Fort Washington, PA 19034-7544
Tel (215) 646-6000
Fax (215) 646-0379**

Federal Tax I.D. [REDACTED]

September 7, 2021

Hatboro Federal Savings
Linda Roehner, President
221 S. York Road
Hatboro, PA 19040-3497

Re: 20102 - 00033 HFS v. Weber, Amy

Invoice Number: 166884

Professional Services through 08/12/2021

<u>Atty</u>	<u>Date</u>	<u>Description</u>	<u>Hours</u>
JM	08/02/2021	Receipt and review of correspondence from Sheriff regarding August 13 sale; Conference with paralegal; Telephone conference with client.	0.40
RMG	08/06/2021	Follow up with John McAneney and Elena Baylarian upset price for sheriff sale. Conference with Elena Baylarian.	0.20
EMB	08/06/2021	Conference with paralegal regarding sheriff sale upset price.	0.10
EMB	08/10/2021	Conference John J. McAneney, Esquire, email to opposing counsel Brian McVan, Esq, email to client regarding upset price, review judgment amount.	0.30
JM	08/11/2021	Telephone conference with opposing counsel (McVan); Telephone conference with client regarding [REDACTED] Conference with C. Snyder regarding bankruptcy research.	1.80
EMB	08/11/2021	Intraoffice conferences with John J. McAneney, Esquire, C. Snyder and R. Gould regarding [REDACTED], call with opposing counsel, call with client regarding [REDACTED].	0.70

20102 Hatboro Federal Savings Invoice# 166884 Page 2

CS	08/11/2021	Conference with John J. McAneney, Esquire.	0.70
JM	08/12/2021	Receipt and review of correspondence regarding bankruptcy; Correspondence to Court; Telephone conference with client; Review and analysis of file; Conference with paralegal.	0.80
JM	08/12/2021	Receipt and review of memos regarding bid price; Conference with E. Baylarian and paralegal.	0.30
RMG	08/12/2021	Receipt of email from court with Bankruptcy entry. Conference with Elena Baylarian and John McAneney regarding [REDACTED] Telephone conference Sheriff Office re procedure, prepare letter to request to postpone sale.	0.80
EMB	08/12/2021	Review upset figures, conference R. Gould, receipt and review of email from opposing counsel Brian McVan, Esq, review bankruptcy petition.	0.40

Billing Summary

Total professional services	\$2,461.00
Total of new charges for this invoice	\$2,461.00
Total balance now due	<u>\$2,461.00</u>

Invoice Due Upon Receipt
Make checks payable to: Timoney Knox, LLP
Remit to address: 400 Maryland Drive, P. O. Box 7544, Fort Washington, PA 19034-7544
You can pay your invoice online at our secured website at www.timoneyknox.com
If you would like your invoice by email, please email your request to pcollins@timoneyknox.com

TIMONEY KNOX, LLP

P.O. Box 7544
400 Maryland Drive
Fort Washington, PA 19034-7544
Tel (215) 646-6000
Fax (215) 646-0379

Federal Tax I.D. [REDACTED]

October 5, 2021

Hatboro Federal Savings
Linda Roehner, President
221 S. York Road
Hatboro, PA 19040-3497

Re: 20102 - 00033 HFS v. Weber, Amy

Invoice Number: 167351

Professional Services through 09/30/2021

<u>Atty</u>	<u>Date</u>	<u>Description</u>	<u>Hours</u>
JM	08/13/2021	Telephone conference with client regarding bankruptcy filing; conference with paralegal.	0.50
RMG	08/13/2021	Telephone conference with Claire Simon at Sheriff's office on procedure for postponing sale; Conference with Elena Baylarian and John J. McAneney, Esquire re [REDACTED]; letter to Sheriff's office to postpone.	0.70
EMB	08/13/2021	Review loan documents regarding ongoing obligations, conference with John J. McAneney, Esquire regarding bankruptcy.	0.40
EMB	08/17/2021	Draft Motion for Relief from the Automatic Stay.	1.30
EMB	08/18/2021	Research and draft Motion for Relief from the Automatic Stay.	3.20
JM	08/19/2021	Revisions to Motion.	0.80
RMG	08/19/2021	Prepare Notice of request for notices and file notice with Bankruptcy Court.	0.30

20102 Hatboro Federal Savings Invoice# 167351 Page 2

EMB	08/19/2021	Research and edit Motion for Relief from the Automatic Stay.	0.30
JM	08/25/2021	Telephone conference with client regarding status.	0.20
EMB	08/25/2021	Edit Motion for Relief from Automatic Stay, conference with paralegal regarding [REDACTED]	0.40
JM	08/26/2021	Receipt and review of draft Motion for Bankruptcy Court.	1.00
JM	08/26/2021	Receipt and review of bankruptcy plan; Conference with paralegal.	0.50
RMG	08/26/2021	Review Bankruptcy Plan and other financial submissions, discuss with John J. McAneney, Esquire.	0.30
JM	08/27/2021	Preparation of, and revisions to, Motion for Relief; Conference with C. Snyder regarding research.	2.30
CS	08/27/2021	Conference with John J. McAneney, Esquire. Legal Research on [REDACTED].	3.30
JM	08/28/2021	Revisions to Motion.	1.10
RMG	08/28/2021	Look up and Calendar Proof of Claim Deadline.	0.20
EMB	08/29/2021	Review of bankruptcy plan submitted by John MacIntosh.	0.20
JM	08/30/2021	Receipt and review of correspondence from client regarding [REDACTED].	0.10
CS	08/30/2021	Continued legal research on [REDACTED] [REDACTED] Conference with John J. McAneney, Esquire.	2.20
RMG	09/01/2021	Receipt and review of Bankrupt notices. Receipt and review of Bankruptcy schedule of hearings and deadlines, calendar.	0.30

20102 Hatboro Federal Savings Invoice# 167351 Page 3

EMB	09/03/2021	Conference with paralegal regarding status and next steps for bankruptcy.	0.20
JM	09/08/2021	Receipt and review of bankruptcy notices.	0.10
JM	09/23/2021	Receipt and review of Memorandum re: September payment not made.	0.10
RMG	09/23/2021	Proof of claim forms, enter information on hand, follow up with John J. McAneney, Esquire re filing. Conference with E. Baylarian.	0.70
EMB	09/23/2021	Conference with paralegal regarding filings in bankruptcy action, email to client regarding post petition payment.	0.10
RMG	09/24/2021	Calendar dates for Bankruptcy, discuss Proof of Claim with John J. McAneney, Esquire, review guidelines for calculating Proof of Claim.	0.60

Billing Summary

Total professional services	\$7,404.00
Total of new charges for this invoice	\$7,404.00
Total balance now due	<u>\$7,404.00</u>

<p style="text-align: center;">Invoice Due Upon Receipt</p> <p style="text-align: center;">Make checks payable to: Timoney Knox, LLP</p> <p style="text-align: center;">Remit to address: 400 Maryland Drive, P. O. Box 7544, Fort Washington, PA 19034-7544</p> <p style="text-align: center;">You can pay your invoice online at our secured website at www.timoneyknox.com</p> <p style="text-align: center;">If you would like your invoice by email, please email your request to pcollins@timoneyknox.com</p>
--

TIMONEY KNOX, LLP

P.O. Box 7544
400 Maryland Drive
Fort Washington, PA 19034-7544
Tel (215) 646-6000
Fax (215) 646-0379

Federal Tax I.D. [REDACTED]

December 15, 2021

Hatboro Federal Savings
Linda Roehner, President
221 S. York Road
Hatboro, PA 19040-3497

Re: 20102 - 00033 HFS v. Weber, Amy

Invoice Number: 168439

Professional Services through 10/31/2021

<u>Atty</u>	<u>Date</u>	<u>Description</u>	<u>Hours</u>
JM	10/08/2021	Review and analysis of Motion and Brief re: relief from automatic stay due to fraud and separate motion due to failure to pay.	0.50
EMB	10/14/2021	Preparation of bankruptcy motions for filing, draft notices, service affidavits and court calendar.	2.10
JM	10/18/2021	Conference with paralegal re: proof of claim.	0.20
RMG	10/18/2021	Review ledger from Hatboro Federal Savings re: payments; long telephone conference with John Weber; prepare spreadsheet re: Proof of Claim.	4.50
RMG	10/19/2021	Continue working on spreadsheet to [REDACTED] complete Schedule A on Proof of claim. Follow up Telephone conference with John Weber to discuss [REDACTED]	4.70
RMG	10/20/2021	Conference with John J. McAneney, Esquire re: Proof of Claim; revisions to same.	2.00
EMB	10/20/2021	Conference with paralegal regarding filing and information for	0.20

20102 Hatboro Federal Savings Invoice# 168439 Page 2

Proof of Claim.

RMG	10/21/2021	Receipt of and review of filed motions, update checklist.	0.40
JM	10/29/2021	Receipt and review of Answer to Petition.	0.20
JM	10/30/2021	Receipt and review of memorandum from E. Baylarian; Review and analysis of Answer to Motion.	0.40
EMB	10/30/2021	Review Answer to Motion for Relief regarding property transfer filed by Debtor.	0.20
EMB	10/31/2021	Research regarding answer filed to Motion for Relief.	0.70

Expenses through 10/31/2021

10/15/2021	Pennsylvania Eastern Bankruptcy Court; Filing Fee for Motion for Relief from Automatic Stay	188.00
10/15/2021	Pennsylvania Eastern Bankruptcy Court; Filing Fee for Motion for Relief (#2)	188.00
10/19/2021	PACER SERVICE CENTER; DOCKET ENTRIES 8/12; 8/15; 8/19; 8/25; 8/26; 8/27; 9/2 PAEBK (66 pages)	6.60
		<hr/> \$382.60

Billing Summary

Total professional services	\$4,471.00
Total expenses incurred	<hr/> \$382.60
Total of new charges for this invoice	<hr/> \$4,853.60
Total balance now due	<hr/> <hr/> \$4,853.60

Invoice Due Upon Receipt
 Make checks payable to: Timoney Knox, LLP
 Remit to address: 400 Maryland Drive, P. O. Box 7544, Fort Washington, PA 19034-7544
 You can pay your invoice online at our secured website at www.timoneyknox.com
 If you would like your invoice by email, please email your request to pcollins@timoneyknox.com

TIMONEY KNOX, LLP

P.O. Box 7544
400 Maryland Drive
Fort Washington, PA 19034-7544
Tel (215) 646-6000
Fax (215) 646-0379

Federal Tax I.D. [REDACTED]

December 21, 2021

Hatboro Federal Savings
Linda Roehner, President
221 S. York Road
Hatboro, PA 19040-3497

Re: 20102 - 00033 HFS v. Weber, Amy

Invoice Number: 168486

Professional Services through 11/30/2021

<u>Atty</u>	<u>Date</u>	<u>Description</u>	<u>Hours</u>
EMB	11/08/2021	Review information for call for Meeting of Creditors. Call Trustees for Meeting of Creditors. Review emails from opposing counsel, call from counsel, call to bankruptcy Court.	0.70
EMB	11/10/2021	Receipt and review of documents from client. Call and email to Trustee, research regarding Objection to Plan.	0.70
RMG	11/11/2021	Conference with John J. McAneney, Esquire re sheriff sale and process to postpone.	0.20
EMB	11/11/2021	Draft objections to plan confirmation.	1.00
JM	11/12/2021	Review Analysis of Objection to Confirmation.	0.30
EMB	11/18/2021	Conference with John J. McAneney, Esquire, draft letter to opposing counsel, Michelle Lee and review debt for proposed resolution.	0.60
EMB	11/29/2021	Call to court regarding motion to continue sheriff sale, call with Bankruptcy Court clerk, conf John J. McAneney, Esquire, call with client, prepare and file exhibits in anticipation of hearing,	3.10

20102 Hatboro Federal Savings

Invoice# 168486

Page 2

emails with client, email to opposing counsel with exhibits and notifying her of witness, prepare for hearing.

EMB	11/30/2021	Calls with John Weber in preparation for hearing and post-hearing, conf JJm regarding hearing, attendance and participation in Motion for relief hearing.	1.70
-----	------------	---	------

Billing Summary

Total professional services	\$2,531.00
Total of new charges for this invoice	\$2,531.00
Total balance now due	\$2,531.00

Invoice Due Upon Receipt

Make checks payable to: Timoney Knox, LLP

Remit to address: 400 Maryland Drive, P. O. Box 7544, Fort Washington, PA 19034-7544

You can pay your invoice online at our secured website at www.timoneyknox.com

If you would like your invoice by email, please email your request to pcollins@timoneyknox.com

TIMONEY KNOX, LLP

P.O. Box 7544
400 Maryland Drive
Fort Washington, PA 19034-7544
Tel (215) 646-6000
Fax (215) 646-0379

Federal Tax I.D. [REDACTED]

January 24, 2022

Hatboro Federal Savings
Linda Roehner, President
221 S. York Road
Hatboro, PA 19040-3497

Re: 20102 - 00033 HFS v. Weber, Amy

Invoice Number: 168822

Professional Services through 12/31/2021

<u>Atty</u>	<u>Date</u>	<u>Description</u>	<u>Hours</u>
RMG	12/06/2021	Conference with John J. McAneney, Esquire re status and receipt of order from Bucks County. Prepare letter to Sheriff Department re continue sheriff sale, copy of order to sheriff department.	0.40
EMB	12/08/2021	Participated in Meeting of Creditors.	0.30
EMB	12/13/2021	Review of letter, edit and send letter to opposing counsel.	0.20
EMB	12/28/2021	Conference with John J. McAneney, Esquire regarding hearing scheduled for January 4.	0.10
EMB	12/29/2021	Emails to John Weber regarding [REDACTED].	0.20
EMB	12/31/2021	Review ledger received from client. Emails with client.	0.30

Billing Summary

20102 Hatboro Federal Savings

Invoice# 168822

Page 2

Total professional services	<u>\$430.00</u>
Total of new charges for this invoice	<u>\$430.00</u>
Total balance now due	<u><u>\$430.00</u></u>

Invoice Due Upon Receipt

Make checks payable to: Timoney Knox, LLP

Remit to address: 400 Maryland Drive, P. O. Box 7544, Fort Washington, PA 19034-7544

You can pay your invoice online at our secured website at www.timoneyknox.comIf you would like your invoice by email, please email your request to pcollins@timoneyknox.com

TIMONEY KNOX, LLP

P.O. Box 7544
400 Maryland Drive
Fort Washington, PA 19034-7544
Tel (215) 646-6000
Fax (215) 646-0379

Federal Tax I.D. [REDACTED]

February 11, 2022

Hatboro Federal Savings
Linda Roehner, President
221 S. York Road
Hatboro, PA 19040-3497

Re: 20102 - 00033 HFS v. Weber, Amy

Invoice Number: 169151

Professional Services through 01/31/2022

<u>Atty</u>	<u>Date</u>	<u>Description</u>	<u>Hours</u>
EMB	01/03/2022	Review of statements from client, preparation of exhibits for hearing, preparation for hearing, review email from opposing counsel M. Lee.	0.90
EMB	01/04/2022	Calls with client, conferences with John J. McAneney, Esquire, preparation for and attend hearing, facilitate exhibit filing.	1.70
EMB	01/06/2022	Review of post-petition legal fees, email to client regarding post petition total.	0.20
EMB	01/07/2022	Receipt and review of post-petition balance from client.	0.10
RMG	01/10/2022	Conference with Elena Baylarian re [REDACTED].	0.10
EMB	01/10/2022	Calculate balance, memo and conference with John J. McAneney, Esquire.	0.30
EMB	01/11/2022	Follow up on hearing status with paralegal.	0.10
EMB	01/28/2022	Email from opposing counsel, call with client, draft email to	0.40

20102 Hatboro Federal Savings

Invoice# 169151

Page 2

opposing counsel, email to John J. McAneney, Esquire.

Expenses through 01/31/2022

01/19/2022	U.S. Courts: PACER; DOCKET ENTRIES - Docket searches	15.50
	10/13 - 12/9/2021 (PA Eastern Bankruptcy Court)	
		<hr/>
		\$15.50

Billing Summary

Total professional services	\$1,190.50
Total expenses incurred	<hr/> \$15.50
Total of new charges for this invoice	<hr/> \$1,206.00
Total balance now due	<hr/> <hr/> \$1,206.00

Invoice Due Upon Receipt
Make checks payable to: Timoney Knox, LLP
Remit to address: 400 Maryland Drive, P. O. Box 7544, Fort Washington, PA 19034-7544
You can pay your invoice online at our secured website at www.timoneyknox.com
If you would like your invoice by email, please email your request to pcollins@timoneyknox.com

Client: 000000020102-Hatboro Federal Savings
Matter: 000000000033-Hatboro Fed: HFS v. Weber, Amy

Code	Date	Employee	Hours To	Rate	Amount	Narrative
00033	2/1/	EBAY	0.10	31	\$31.	Conference with John J. McAneney, Esquire regarding [REDACTED].
00033	2/2/	EBAY	0.10	31	\$31.	Follow up with paralegal regarding bankruptcy filings.
00033	2/2/	RGOU	0.20	25	\$50.	Conference with Elena Baylarian, run bankruptcy docket per her request for hearing
00033	2/4/	EBAY	0.10	31	\$31.	Respond to email from opposing counsel, Michelle Lee.
00033	2/6/	EBAY	0.30	31	\$94.	Review Post-Petition balance in preparation for hearing.
00033	2/7/	EBAY	1.20	31	\$378	Emails with opposing counsel, conference with John J. McAneney, Esquire, research
00033	2/8/	EBAY	2.40	31	\$756	Preparation for and representation at hearing, calls with client regarding hearing,
00033	2/9/	EBAY	0.20	31	\$63.	Review sheriff sale notice rules, conference with paralegal regarding requesting
00033	2/10	EBAY	0.10	31	\$31.	Conference with paralegal regarding sheriff sale extension order.